

Independent Taxi Owners Association
Call Sign WQKD673
Request for Renewal and Reinstatement
April, 2019

**REASON FOR GRANTING WAIVER TO
PERMIT LATE-FILED RENEWAL APPLICATION**

Independent Taxi Owners Association (“ITOA”), licensee of call sign WQKD673, hereby requests a waiver of Section 1.949(a) of the Commission’s Rules in order to file the instant renewal application for that license. The deadline for submitting a renewal application without needing a waiver of that rule was April 13, 2019. This request for waiver, renewal and reinstatement is therefore being filed less than thirty (30) days after the original due date.

The failure to submit the renewal application prior to the original deadline was due to a change in office personnel and administrative oversight. The contact person listed in the license, Nettabai Ahmed, is no longer acting as contact representative for ITOA. The renewal reminder was addressed to him and apparently not reviewed by anyone. ITOA apologizes to the Commission for its error, and is updating its internal procedures with a view to removing the possibility that a similar mistake would happen in the future.

Under general Commission policy, to avoid the harsh result of license termination, the Commission generally grants waiver and reinstatement where, as here, a renewal application is in fact filed within 30 days after license expiration. *See Biennial Regulatory Review – Amendment of Parts 0, 1, 13, 22, 24, 26, 27, 80, 87, 90, 95 and 101 of the Commission’s Rules to Facilitate Development and Use of the Universal Licensing System in the Wireless Telecommunications Services*, Memorandum Opinion and Order on Reconsideration, 14 FCC Rcd 11476, 11485 (“*ULS MO&O*”). Therein, the Commission stated:

If a renewal application is late-filed up to 30 days after the license expiration date in any wireless service, and the application is otherwise sufficient under our rules, we will grant the renewal *nunc pro tunc*.

ITOA fits within this policy, and hereby respectfully requests a waiver as set forth above.